

EXHIBIT B

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BY FACSIMILE AND E-MAIL

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Matthew L. Woods, Esq.
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Re: Honeywell International Inc. et al. v. Apple Computer Inc. et al.
USDC/DDE Case No. 04-1338-KAJ
Our Client/Matter No. 208801/0921

Dear Matt:

This is in response to your letter of October 17, 2006. I responded to the issue you raise in your first paragraph in a separate e-mail. Turning to the two other issues raised in your letter, I respond as follows:

1. We disagree as to the need for Fuji to make an election at this time, especially given the two-stage trial ordered by Judge Jordan. Accordingly, we have no intention to make such an election in the near future.
2. Regarding the situs for depositions of employees of Fuji Japan, Fuji will exercise its right to have such employees deposed in Japan at a U.S. Embassy or Consulate.

Sincerely,



Lawrence Rosenthal

cc: Denise Rahne, Esq.
Matthew W. Siegal, Esq.
Kevin Ecker, Esq.
Angie Hankins, Esq.
Phil Rovner, Esq.

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DATE 10/24/2006

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SUBJECT Re: Honeywell International, Inc., et al. v. Apple Computer Inc., et al.

TOTAL NO. OF PAGES 2

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MESSAGE

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